

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

MDL No. 2875

**Honorable Renée Marie Bumb,
District Judge**

This Documents Relates to All Actions

**ZHP DEFENDANTS' NOTICE OF OBJECTIONS TO
AND MOTION TO REVERSE SPECIAL MASTER'S ORDER DENYING
LEAVE TO FILE SECOND AMENDED ANSWER AND AFFIRMATIVE
DEFENSES**

PLEASE TAKE NOTICE that on June 3, 2024, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC (collectively, “the ZHP Defendants”), by and through their undersigned counsel, shall move for the entry of an Order vacating Special Master Order No. 97 (ECF [2701](#)) and allowing the filing of the ZHP Defendants’ Second Amended Answer and Affirmative Defenses. This objection and motion to vacate Special Master Order No. 97 is made to the Honorable Renée Marie Bumb, Chief United States District Judge, pursuant to Rule 53(f) of the Federal Rules of Civil Procedure and the applicable local rules of this Court.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the ZHP Defendants shall rely on the accompanying Memorandum of Law in Support of the ZHP Defendants’ Objections to and Motion to Reverse Special Master’s Order Denying Leave to File Second Amended Answer and Affirmative Defenses.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested, pursuant to Fed. R. Civ. P. 53(f)(1), if this motion is opposed.

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: May 9, 2024

Respectfully submitted,

By: /s/ Jessica Davidson

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Inc., and Solco Healthcare U.S., LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 9, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson
Jessica Davidson